

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

**LEXISNEXIS RISK DATA  
MANAGEMENT INC.,**

**Plaintiff,**

**v.**

**WENDY ESPINOZA,**

**Defendant.**

**Misc. Action No. CIV-18-639-M**

**(Case No. 2:17-cv-01977 pending in the  
United States District Court for the  
District of Arizona, Phoenix Division)**

**LEXISNEXIS RISK DATA MANAGEMENT INC.'S MOTION TO QUASH  
PLAINTIFF'S THIRD-PARTY SUBPOENA**

Pursuant to Rules 45(c) and 26(c) of the Federal Rules of Civil Procedure, LexisNexis Risk Data Management Inc. ("LNRDM"), through counsel, respectfully requests that this Court quash the Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action, dated February 9, 2018 issued by the Plaintiff Wendy Espinoza to LNRDM in Case No. 2:17-cv-01977 (D. Ariz.). The reasons in support of the Motion are set forth in the accompanying brief.

WHEREFORE, LexisNexis Risk Data Management Inc. respectfully requests that the Court enter an Order quashing the Subpoena issued to LNRDM. Alternatively, LNRDM requests that the Court issue a protective order postponing any further document production until after the parties have completed the July 12, 2018 settlement conference and any additional scheduled settlement conferences.

**LOCAL RULE 37.1 CERTIFICATION**

The undersigned counsel certifies that after diligent attempts to resolve their differences, the parties are unable to reach an accord. Counsel for LNRDM, who resides in Virginia, conferred via telephone with Plaintiff's counsel, who resides in Arizona, regarding these same issues that are presented in Plaintiff's Motion to Compel and further conferred via email with Plaintiff's counsel, while counsel was out of the country, regarding the present Motion to Quash.

Dated: June 29, 2018

**LEXISNEXIS RISK DATA MANAGEMENT INC.**

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 29th day of June 2018, I filed the foregoing pleading electronically using the Court's ECF system and also served a copy via electronic and regular U.S. mail on the following counsel of record:

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